

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JACQUELINE ONOFRE, INDIVIDUALLY
AND A/N/F OF LUKE ONOFRE and
HANNAH ONOFRE, MINORS

v.

C.R. ENGLAND, INC. and
PAUL JOHNSON

CIVIL ACTION NO. NO: 15-CV-00425-DAE

DEFENDANTS' FIRST SUPPLEMENTAL DESIGNATION OF EXPERT WITNESSES

TO THE HONORABLE JUDGE OF SAID COURT:

C.R. ENGLAND, INC. and PAUL JOHNSON, Defendants in the above-styled and numbered cause, hereby designate the following expert witnesses in accordance with this Honorable Court's Scheduling Order and Rule 29 stipulations among the parties:

RETAINED EXPERT WITNESSES

(1) Richard V. Baratta, Ph.D.
Rimkus Consulting Group, Inc.
Eight Greenway Plaza, Suite 500
Houston, Texas 77046
(713) 621-3550

Dr. Baratta holds a Ph.D. in biomedical engineering and will provide opinions regarding biomechanics, mechanism of injury, occupant kinematics, impact analysis, and accident reconstruction, among other things. Dr. Baratta's expert report, Curriculum Vitae, testimony listing, and fee schedule were previously provided with Defendants' original expert designation. Dr. Baratta's complete file, including his notes, memoranda, diagrams, photographs, radiology films and further exhibits which he expects to use at the trial of this case, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Baratta is presented for deposition.

(2) John R. Anderson, M. D.
511 Kreutzberg Road
Boerne, Texas 78006
(830) 446-9733

Dr. Anderson is Defendants' orthopedic surgeon expert and will provide opinions regarding Plaintiff Jacqueline Onofre's alleged injuries, the diagnoses and

treatment provided to Plaintiff Jacqueline Onofre, and the prognosis for Plaintiff Jacqueline Onofre's recovery from her alleged injuries, among other things Dr. Anderson's expert report, Curriculum Vitae, testimony listing, and fee schedule were previously provided with Defendants' original expert designation. Dr. Anderson's complete file, including notes, memoranda, medical records, photographs, radiology films and literature in support of his opinions, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Anderson is presented for deposition.

(3) **Dr. Irmo Marini, Ph.D., D.Sc., CRC, CLCP, FVE®**
2609 Brazos Avenue
McAllen, Texas 78504
(956) 380-6499

Dr. Marini is Defendants' vocational rehabilitation expert and will provide opinions regarding Plaintiff Jacqueline Onofre's educational background and training, her ability to be employed, employment positions available to her in the market, her qualifications and skill set for employment, among other vocational issues. See Dr. Marini's expert report (Exhibit "H"), Curriculum Vitae (Exhibit "I"), testimony listing (Exhibit "J") and fee schedule (Exhibit "K"). Dr. Marini is expected to base his opinions on his training, education, experience, and qualifications. He may also rely on tests, experiments, research studies, or reports he has performed/prepared or with which he is familiar, in addition to the materials reviewed as part of Dr. Marini's file in this case. Dr. Marini's complete file, including notes, memoranda, medical records, photographs, radiology films and literature in support of his opinions, will be made available for inspection by counsel for Plaintiff at a mutually convenient time and place, and will be produced at the time Dr. Marini is presented for deposition.

NON-RETAINED EXPERT WITNESSES

(4) Deputy R. Gill, ID No. 2943
 Bexar County Sheriff's Department
 200 North Comal Street
 San Antonio, Texas 78207
 (210) 335-6300
 Deputy Gill investigated the accident in question. See copy of Deputy Gill's accident investigation report previously produced as CRE-0001 through CRE-0004.

(5) Plaintiffs' Medical Providers, as follows –
 Doctors, Nurses, Technicians, Other Medical Providers
 And the Custodian of Records for
 Christus Santa Rosa – Westover Hills

11212 Texas Highway 151
San Antonio, Texas 78251
(210) 703-8000

Doctors, Nurses, Technicians, Other Medical Providers
And the Custodian of Records for
Family Clinics of San Antonio
11730 West Avenue
San Antonio, Texas 78216
(210) 340-8501

Hugo Alonzo Rojas, M. D.
And the Custodian of Records for
Family Clinics of San Antonio
2115 Pleasanton Road, Suite 205
San Antonio, Texas 78221
(210) 922-3627

Michael Murphy, M. D.
And the Custodian of Records for
Consultants in Pain Medicine
423 Treeline Park
San Antonio, Texas 78209
(210) 546-1455

Doctors, Nurses, Technicians, Other Medical Providers
And the Custodian of Records for
Medical Center Ophthalmology Associates
9157 Huebner Road
San Antonio, Texas 78240
(210) 267-2020

Doctors, Nurses, Technicians, Other Medical Providers
And the Custodian of Records for
River City Chiropractic – Ingram
6338 N.W. Loop 410
San Antonio, Texas 78238
(210) 682-9696

Doctors, Nurses, Technicians, Other Medical Providers
And the Custodian of Records for
Premier Medical Imaging
11730 West Avenue
San Antonio, Texas 78216
(210) 922-0016

Michael Leonard, M. D.
And the Custodian of Records for
Alamo Neurosurgical Institute
414 West Sunset Road, Suite 205
San Antonio, Texas 78209
(210) 564-8300

Cesar Gerez-Martinez, M. D.
And the Custodian of Records for
MedFirst Westover Hills Primary Care Clinic
3903 Wiseman Boulevard, Suite 100
San Antonio, Texas 78251
(210) 681-0126

Doctors, Nurses, Technicians, Other Medical Providers
And the Custodian of Records for
San Antonio Military Medical Center
78234, 3551 Roger Brooke Drive
San Antonio, Texas 78219
(210) 916-4342

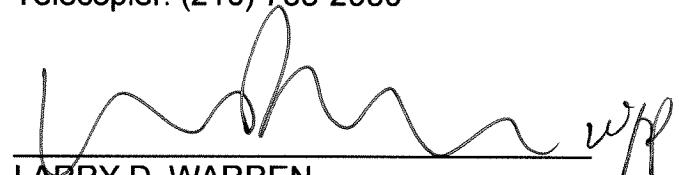
Doctors, Nurses, Technicians, Other Medical Providers
And the Custodian of Records for
Bennett Health Clinic
761st Tank Battalion Avenue
Fort Hood, Texas 76544
(254) 618-8039

Ricardo A. Riojas, M. D.
And the Custodian of Records for
San Antonio Pediatric Associates, P.A.
9793 Culebra Road, Suite 105
San Antonio, Texas 78251
(210) 681-6439

Defendants further reserve the right to call to testify, cross examine, and/or elicit testimony from all persons and experts (whether retained or non-retained) identified by Plaintiff or any other party, and to call to testify, cross examine, and/or elicit testimony from any responsible third party in this lawsuit. Defendants do not adopt the opinions and/or conclusions of the persons and experts not retained by Defendant but who have been identified by Defendants, Plaintiffs, or any other party. Furthermore, Defendants cannot vouch for the knowledge, skill, experience, training, education, or credibility of the persons not retained by Defendants but identified as non-retained experts or identified as retained or non-retained experts by Plaintiff or any other party, nor do Defendants agree that such persons qualify as experts regarding the matters on which they seek to testify.

Respectfully submitted,

NAMAN HOWELL SMITH & LEE, PLLC
10001 Reunion Place, Suite 600
San Antonio, Texas 78216
Telephone: (210) 731-6350
Telecopier: (210) 785-2950



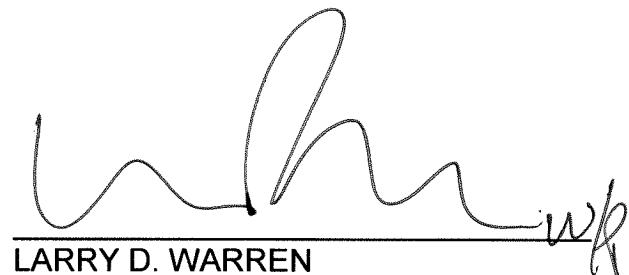
LARRY D. WARREN
State Bar No. 20888450
ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been sent on the 15th day of January, 2016, to the following:

F-Filing Notification

rwilson@thomasjhenrylaw.com
Mr. Thomas J. Henry
Mr. Robert P. Wilson
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Corpus Christi, Texas 78401
ATTORNEYS FOR PLAINTIFFS



LARRY D. WARREN